

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

IN RE:

Stephen Hines and
Khadijah Hines,

Debtors.

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)

CHAPTER 7

CASE NO. 11-63555-wlh

**MOTION TO REOPEN CHAPTER 7 CASE FOR THE LIMITED PURPOSE OF
AMENDING SCHEDULES, STATEMENT OF FINANCIAL AFFAIRS, AND FILING
MOTION TO AVOID JUDICIAL LIENS**

COME NOW Stephen and Khadijah Hines Debtors, through undersigned counsel, and moves this Court to Reopen this Chapter 7 case for the Limited Purpose of amending schedules, statement of financial affairs, and filing Motion to Avoid Judicial Liens. In support thereof, Debtors show the Court as follows:

1.

This case was commenced upon Debtors filing a Voluntary Petition in Bankruptcy for relief under Chapter 7 of Title 11 of the United States Code on May 2, 2011.

2.

This Chapter 7 case was closed with discharge on November 7, 2011.

3.

The Debtors come now before the Court to ask that the estate be re-opened to allow Debtors' attorney to file an amendment to Schedule D, an amendment to Statement of Financial Affairs, and to re-file two Motion to Avoid Judicial Lien's.

WHEREFORE, Debtors ask that the estate be re-opened to allow the Debtors' attorney to file an amendment to Schedule D, an amendment to Statement of Financial Affairs, and to re-file two Motion to Avoid Judicial Lien's.

WHEREFORE, Debtors pray that this Motion to Reopen Chapter 7 Case be allowed and for such other relief as this Court deems equitable and just.

Dated: November 9, 2011

Respectfully submitted,
The Sandberg Law Firm

_____/s/
Tony Sandberg
Attorney for Debtors
GA Bar No. 625210
229 Peachtree Street
International Tower, Suite 705
Atlanta, GA 30303
(404) 827-9799
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NOTICE OF HEARING

PLEASE TAKE NOTICE that Stephen Hines and Khadijah Hines have filed a "Motion to Reopen Chapter 7 Case" and related papers with the Court.

PLEASE TAKE FURTHER NOTICE that the Court will hold a hearing on the Motion in **Courtroom 1403**, United States Courthouse, 75 Spring Street, SW. Atlanta, Georgia at **9:30 A.M. on December 7, 2011**.

Your rights may be affected by the court's ruling on these pleadings. You should read these pleadings carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one.). If you do not want the court to grant the relief sought in these pleadings or if you want the court to consider your views, then you and/or your attorney must attend the hearing. You must also file a written response to the pleading with the Clerk at the address stated below, but you are not required to do so. If you file a written response, you must attach a certificate stating when, how and on whom (including addresses) you served the response. Mail or deliver your response so that it is received by the Clerk at least two business days before the hearing. The address of the Clerk's Office is Clerk, U.S. Bankruptcy Court, Suite 1340, 75 Spring Street, Atlanta, Georgia 30303. You must also mail a copy of your response to the undersigned at the address stated below.

Dated: November 9, 2011

_____/s/
Tony Sandberg, GA Bar No. 625210
Attorney for Debtors
229 Peachtree Street
International Tower, Suite 705
Atlanta, GA 30303
(404) 827-9799 Telephone

UNITED STATES BANKRUPTCY COURT
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CERTIFICATE OF SERVICE

The undersigned hereby certifies:

That I am more than eighteen years of age, and that on this day I served a copy of the within "Debtors' Motion to Reopen this Chapter 7 case for the Limited Purpose of amending schedules, amending Statement of Financial Affairs, and filing Motion to Avoid Judicial Lien's" filed in this bankruptcy case upon (a) the Chapter 7 Trustee, and the following, by depositing a copy of same in the United States Mail with sufficient postage thereon to ensure delivery to:

Trustee:

Jeffrey K. Kerr
Jeffrey K. Kerr & Company, LLC,
Suite 130
241 West Wieuca Road NE
Atlanta, GA 30342-3300

Debtors:

Stephen Hines and Khadijah
Hines
506 Brook Hollow Drive
McDonough, GA 30252

Creditors:

Aaron's
3636 VA Beach Blvd
Virginia Beach, VA 23455

Ais Services Llc
8996 Miramar Rd Ste 220
San Diego, CA 92126

Allied Interstate, Inc
3000 Corporate Exchange
Columbus, OH 43231

America'S Recovery N
100 Crisler, Ste # 202
Crescent Springs, KY 41017

At&T
Po Box 57907 Attn: Dispute
Investigatio
Murray, UT 84157-0907

Bank of America
4509 E. 47th Street South
Wichita, KS 67210

BB & T
PO Box 580393
Charlotte, NC 28258

BestBank
4000 West Brown Deer Road
Milwaukee, WI 53209

Bon Ton
4545 Transit Rd
Buffalo, NY 14221

Brooks Transfer & Storage Co
1378 London Bridge Rd
Virginia Beach, VA 23453

Cap One
Po Box 85015
Richmond, VA 23285

Cbe Group
131 Tower Park Dr Suite 100 Po
Box 900
Waterloo, IA 50704-0900

Certegy
P.O. Box 30046
Tampa, FL 33630

Chartway Federal Credit Union
1405 Stephanie Way
Chesapeake, VA 23320

Chase
Po Box 15298
Wilmington, DE 19850

Child Support Enforcem
3670 N L St Ste B
Pensacola, FL 32505

CLM Sanitation
3351 Hwy 4 North
Stockbridge, GA 30281

Colortyme
14535 Jefferson Davis Hwy
Woodbridge, VA 22191

Columbia Gas of Virginia
PO Box 742510
Dept 6250
Cincinnati, OH 45274

Complete Credit Solution
2921 Brown Trl
Bedford, TX 76021

Corporate Mailing Address
PO Box 2710
Manassas, VA 20108

Cox Cable
5200 Cleveland St
Virginia Beach VA 23462

Credit Adjustment Bo
306 East Grace Street
Richmond VA 23219

Credit Control Corp
11821 Rock Landing Dr
Newport News, VA 23606

Dfas-CI
1240 # 9th St
Cleveland OH 44199

Dominion Virginia Power
PO Box 26543
Richmond, VA 23290

Easy Money Cash Centers
3355 Vanderbilt Rd
Birmingham, AL 35217

Enhanced Recovery Co
8014 Bayberry Rd
Jacksonville FL 32256

Equidata
724 Thimble Shaolas Blvd
Newport News, VA 23606

Exeter Finance Corporation
PO Box 166008
Irving TX 75016

First Premier Bank
601 S. Minnesota Ave
Sioux Falls, SD 57104

Firstpoint Coll Reso
Roanoke VA 24018

Focus Receivables Mana
1130 Northcase Pkwy Ste
Marietta GA 30067

Focused Recovery Solut
9701 Metropolitan Ct Ste
Richmond VA 23236

Ford Cred
PO Box 542000
Omaha, NE 68154

Ford Motor Credit Co.
PO Box 689007
Franklin TN 37068

Frontier Financial Group
419 Stephanie St
Henderson NV 89014

Gary A. Pecher
1405 Hawthorne Court
Virginia Beach, VA 23456

Gemb/Dillards
PO Box 981400
El Paso, TX 79998

Georgia Dept of Revenue
1800 Century Blvd NE
Suite 18300
Atlanta GA 30308

Glenn Associates Mid
323-A Washington Blvd
Laurel, MD 20707-4642

Grand Furn
1305 Baker Road
Virginia Beach, VA 23455

Hsbc Bank
PO Box 5253
Carol Stream, IL 60197

IC System Inc.
PO Box 64378
Saint Paul, MN 55164

Internal Revenue Service
401 W. Peachtree St NW
Atlanta, GA 30308

Lease & Rental Mgmt Co
45 Haverhill St
Andover MA 01810

Leasex Rental Management Co.
45 Haverhill St
Andover MA 01810

Linda Patteson
329 Shyne Lake Lane
McDonough, GA 30253

Linda Patterson
14133 S. Ainsworth Street
Gardena CA 90247

LVNV Funding LLC
PO Box 740281
Houston TX 77274

May Department Stores
111 Boulder Industrial Dr
Bridgeton, MO 63044

Michael Stancer
5821 Riverside Dr
Woodbridge, VA 22193

Midland Credit Mgmt
8875 Aero Dr
San Diego, CA 92123

Military Star
3911 S Walton Walker Bv
Dallas TX 75236

Mr. Turf Inc.
34405 W 12 Milie Rd STe 379
Farmington MI 48331

Nae Federal Credit Union
755 Battlefiled Blvd N
Chesapeake VA 23320

NAE Federal Credit Union
2828A Taylor Rd
Chesapeake VA 23325

National Credit Solution
PO Box 15779
Oklahoma City OK 73155

Nationwide Credit Corp
5503 Cherokee Ave
Alexandria, VA 22312

Navy Exchange
3280 Virginia Beach Blvd
Virginia Beach, VA 23452

Navy Federal Cr Union
Po Box 3700
Merrifield, VA 22119

Navy Federal Credit Union
5725 Spohn Drive
Corpus Christi, TX 78468

Nco Fin/22
507 Prudential Rd
Horsham, PA 19044

Nco Fin/99
PO Box 15636
Wilmington DE 19850

Novec
10323 Lonond Dr
Manassas VA 20109

Office of the Atty Gen
PO Box 12017
Austin TX 78711

Payliance
2612 Jackson Ave W
Oxford, MS 38655

Plains Commerce Ban
5109 S. Broadband Ln
Sioux Falls, SD 57108

Plaza Assocs
Seven Penn Plaza
New York, NY 10001

Powell Rogers & Speaks
1 Fisher St
Halifax PA 17032

Prieur Thomas James
3790 Davis Rd
Penn Laird VA 22846

Professnl Acct Mgmt In
633 W Wisconsin Ave Ste
Milwaukee WI 53203

Public Utilities
PO Box 15225
Chesapeake VA 23328

Public Water
2405 Courthouse Drive
Virginia Beach, VA 23456

PWCSA
PO Box 71062
Charlotte NC 28272

Rec Mgm Sys
PO Bpx 17305
Richmond VA 23226

Receivables Management LLC
1130 Northinchase Pky
Suite 150
Marietta GA 30067

Rent-A-Center
Customer Service
5501 Headquarters Drive
Plano, TX 75024

Rjm Acq Llc
575 Underhill Blvd Suite 224
Syosset, NY 11791

RJM Acquisitions LLC
575 Underhill Blvd suite 224
Syosset, NY 11791

RK Chevrolet
2661 Virginia Beach Blvd
Virginia Beach, VA 23452

Rogers Service Center
9600 Grant Ave
Manassas VA 20110

Security Check
1733 University Ave, Suite 4
Oxford MS 38655

Sentara Medical Group
6015 Poplar Hill Dr
Norfolk VA 23502

Stacie D. Headley
1356 Beachons Reach Dr
Virginia Beach VA 23454

Sterling Church St Furniture
1205 Baker Rd
Virginia Beach VA 23455

Torricon Ramino
3423 Woolfenden Ct
Triangle, VA

Transit Employees FCU
2000 Bladensburg Rd NE
Washington DC 20018

Treasure's Office
2401 Courthouse Drive #260
Virginia Beach VA 23456

Uhaul
14523 Telegraph Rd
Woodbridge VA 22192

United Bank
11185 Fairfax Blvd
Falls Church, VA 22042

USA Discounters Credit
3320 Holand Rd
Virginia Beach, VA 23452

USA Discounters Credit LLC
7734 Hampton Blvd
Norfolk, VA 23505

USAA
PO Box 4750
San Antonio TX 78265

USAA Bank
10750 McDermot Ct
San Antonio, TX 78288

Virginia Dept. of Taxation
PO Box 1115
Richmond VA 23218-1115

Virginia Natural Gas
PO Box 4569
Dept 6250
Atlanta GA 30302

Wachovia Bank
Wells Fargo
439 Battlefield Pkwy
Fort Oglethorpe GA 30742

Washington Gas
6801 Industrial Rd
Springfield, VA 22151

Westlake Financial
4751 Wilshire Blvd
Los Angeles CA 90010

Wayne Wagner
216 Hidden Stream Drive
Apex, NC 27539

Request for add'l notices:
Atlas Acquisitions LLC
294 Union St
Hackensack, NJ 07601
Attn: Avi Schild

Dated: November 9, 2011

Respectfully submitted,
The Sandberg Law Firm

/s/

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Atlanta, GA 30303
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thesandberglawfirm@yahoo.com